

UNITED STATES BANKRUPTCY COURT  
IN THE DISTRICT OF DELAWARE

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U.S. BANKRUPTCY COURT  
DISTRICT OF DELAWARE

In re:

FTX TRADING LTD., et al,

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly administered)

**RESPONSE TO DEBTOR'S TWELTH (SUBSTANTIVE) OMNIBUS  
OBJECTION TO CERTAIN OVERSTATED PROOFS OF CLAIM (CUSTOMER  
CLAIMS) BY CLAIMANT #33150**

Liam Ellmann, Creditor 33150 (Ellmann), by and through his counsel, Ellmann & Ellmann PC, responds to the Debtor's Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims) (Docket #6283) as follows:

1. Ellmann objects to the inclusion of the short, BTC-Perp -11.000 in his account because he was foreclosed from closing out the short by the closure of the FTX exchange. He attempted to close out the short prior to the filing of the bankruptcy but was prevented from doing so.

2. If the Debtor keeps the short in Ellmann's claim, he requests that the value of the short should be the difference between the opening price of the short and the value set for the future position in Exhibit 1 to the Motion of Debtors to Estimate Claims Based on Digital Assets of \$17,108.00 (Docket #5202). The short was purchased very close to the bankruptcy filing of the Debtor and this net value should not significantly affect the value of his claim.

***THEREFORE***, Liam Ellmann, respectfully requests that the Court deny or modify the objection to claim as stated above.

Dated: February 7, 2024

/s/Douglas S. Ellmann  
Douglas S. Ellmann P34617  
Ellmann & Ellmann P.C.  
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/s/Liam Ellmann  
Liam Ellmann  
Claimant 33150

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this date he served a copy of the attached Response to Objection to claim upon the following parties via email to:

Landis Roth & Cobb LLP, 919 Market St., Ste. 1800, Wilmington, Del. 19801  
Attn: Adam G. Landis ([landis@lrclaw.com](mailto:landis@lrclaw.com)) and Kimberly A. Brown  
([brown@lrclaw.com](mailto:brown@lrclaw.com))

Sullivan & Cromwell LLP, 125 Broad St., New York, New York 10004  
Attn: Alexa J. Kransley ([kransleya@sullcrom.com](mailto:kransleya@sullcrom.com))

Dated: Feb. 7, 2024

/s/ Douglas S. Ellmann

Douglas S. Ellmann P34617

Ellmann & Ellmann P.C.

Attorneys and Counselors

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